

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re Nissan North America, Inc. Litigation

Case No. 3:19-00843

District Judge William L. Campbell, Jr.

Magistrate Judge Chip Frensley

**DECLARATION OF E. PAUL CAULEY, JR. IN SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION TO AMEND COMPLAINT**

I, E. Paul Cauley, Jr. do hereby declare as follows:

1. I am over 21 years of age. This declaration is based upon my personal knowledge of the facts stated herein, or information gathered in the ordinary course of my job responsibilities. I am competent in all respects to give the testimony contained herein and, if called and sworn as a witness, I could testify to these facts. I make this declaration in support of the Opposition of Nissan North America (“NNA”) and Nissan Motor Co., Ltd. (“NML”) to Plaintiffs’ Motion to Amend Complaint.

2. To date, NNA has been served with and responded to 13 Interrogatories, 113 Requests for Production, and 12 Requests for Admissions.

3. To date, NML has been served with and responded to 14 Interrogatories, 120 Requests for Production, and 29 Requests for Admissions.

4. To date, NNA has produced almost 15,000 pages of documents in response to Plaintiffs’ discovery requests. Additional responsive documents have been gathered and are in the process of being reviewed and processed for production.

5. NML has produced just under 750 pages in response to Plaintiffs' discovery requests. Additional responsive documents have been gathered and are in the process of being reviewed and processed for production.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2020.

A handwritten signature in black ink, appearing to read 'E. Paul Cauley Jr.', written over a horizontal line.

E. Paul Cauley Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Declaration was served on counsel for the parties listed below via electronic service:

Joel Dashiell Smith Frederick J. Klorczyk, III Lawrence Timothy Fisher Bursor & Fisher, P.A. 1900 North California Blvd., Suite 940 Walnut Creek, CA 94596 Telephone: (925) 300-4455 Facsimile: (925) 407-2700 Email: jsmith@bursor.com fklorczyk@bursor.com ltfisher@bursor.com	Benjamin L. Bailey Jonathan David Boggs Michael L. Murphy Bailey Glasser LLP 209 Capitol Street Charleston, WV 25301-1386 Telephone: (304) 345-6555 Facsimile: (304) 342-1110 Email: bbailey@baileyglasser.com jboggs@baileyglasser.com mmurphy@baileyglasser.com
Adam J. Levitt John E. Tangren Daniel R. Ferri Dicello Levitt & Casey LLC Ten North Dearborn Street, Eleventh Floor Chicago, Illinois 60602 Tel: (312) 214-7900 Email: alevitt@dlcfirm.com jtangren@dlcfirm.com dferri@dlcfirm.com	H. Clay Barnett, III Wilson Daniel "Dee" Miles, III J. Mitch Williams Beasley, Allen, Crow, Methvin, Portis and Miles, P.C. 218 Commerce Street Montgomery, AL 36104 Telephone: (334) 269-2343 Facsimile: (334) 954-7555 Email: clay.barnett@beasleyallen.com dee.miles@beasleyallen.com mitch.williams@beasleyallen.com
Jaimie Mak Richman Law Group 81 Prospect Street Brooklyn, NY 11201 Telephone: (718) 705-4579 Facsimile: (718) 228-8522 Email: jmak@richmanlawgroup.com	Jeffrey Kaliel, Esq. Kaliel PLLC 1875 Connecticut Avenue NW, 10th Floor Washington, DC 20009 Tel: (202) 350-4783 Email: jkaliel@kalielllc.com
Daniel Adam Schlanger Schlanger Law Group LLP 9 East 40th Street, Suite 130 New York, NY 10016 Telephone: (212) 500-6114 Email: dschlanger@consumerprotection.net	J. Gerard Stranch, IV Benjamin A. Gastel Branstetter, Stranch & Jennings, PLLC 223 Rose L. Parks Avenue, Suite 200 Nashville, Tennessee 37203 Telephone: (615) 254-8801 gerards@bsjfirm.com beng@bsjfirm.com

this 19th day of June, 2020.

s/ Brigid Carpenter
Brigid Carpenter